

1 Q And no red flags went up as far as you know about  
2 negative fund balances?

3 A No.

4 Q And I take it you don't know why?

5 A No, I really don't.

6 Q We'll move on to Bureau Volume Three. Now, Mrs.  
7 Duff, just to put everything in perspective, we're, we're now  
8 up on our, on our timeline to mid to late 1986, and that would  
9 bring us to the Odessa, Texas, station. Is that correct?

10 A Yes, that should be about right.

11 Q Did there come a time when you learned of an oppor-  
12 tunity to acquire a construction permit in Odessa?

13 A Yes.

14 Q How did that come about?

15 A I received a call from Mr. Crouch. He told me that  
16 David Roeber had called him and that he had a construct-- his  
17 brother Al had a construction permit from Odessa and he wasn't  
18 able to build it and he thought that maybe we would be inter-  
19 ested. And at that particular time, Trinity had the full  
20 complement of stations that the FCC would allow. And I was  
21 just made aware not too long before that the Commission had  
22 changed its ownership rules. And, so, I called Colby May to  
23 find out if there were a possibility that NMTV, at that time  
24 it was still Translator, could own a full-powered station  
25 since we had minority control and he told me that it was true,

1 that the rules did allow us to have a station if minorities  
2 were in the majority of the Board. And I talked to David  
3 Espinoza about it and the Board concurred that we would make  
4 the offer to buy this station, and we did so and filed that  
5 application.

6 Q Now, you just mentioned it was your understanding  
7 that TBN had reached what you called its full complement of  
8 stations. What did you mean by that?

9 A That TBN owned -- at that particular time, I believe  
10 they owned 12 stations.

11 Q And what was your understanding as to the  
12 Commission's rules regarding the number of stations that an  
13 entity could own?

14 A It was my understanding that according to the rules  
15 that were released, I think it was August 19-- I forget the,  
16 the year, '83 or whatever it was, that there could be an  
17 additional interest of a group owner if a separate, separate  
18 corporation had minority control.

19 Q What was your basis for that understanding? How did  
20 you know all that?

21 A I had read in the newspaper and broadcasting maga-  
22 zine and Colby May had mentioned it to me. In fact, this had  
23 happened maybe a year before that, that I had gotten this  
24 information, but I never pursued it until we heard of this  
25 opportunity.

1 Q What do you mean you never pursued it?

2 A We never really thought in terms of National  
3 Minority doing something like this with a full-power station.

4 Q Mrs. Duff, couldn't have, couldn't have Translator  
5 TV, Inc., acquired a full-power station before this time?

6 A I, I don't believe so. Not under the terms of the  
7 ownership with, with Trinity, because of the ownership inter-  
8 ests of Mr. Crouch, I, I don't believe so.

9 Q So, it was your understanding that Translator TV,  
10 Inc., could only buy or acquire a full-power station only  
11 after TBN had reached what you called its full complement of  
12 12 stations?

13 A I -- it was -- the, the timing of when I was aware  
14 of this rule and this opportunity, I had never thought of it  
15 in those terms before. It just never occurred to me before,  
16 before that time.

17 Q Well, in 1983, for example, before Trinity had a  
18 full complement of 12 stations, was it your understanding  
19 whether Translator TV, Inc., could acquire a full-power  
20 station?

21 MR. TOPEL: I, I object, Your Honor. The predicate  
22 is incorrect because the full complement wasn't 12 in 1983.

23 JUDGE CHACHKIN: What was the full complement in  
24 1983?

25 MRS. DUFF: It was --

1 MR. TOPEL: Seven.

2 MRS. DUFF: -- seven.

3 JUDGE CHACHKIN: Seven.

4 MR. SCHONMAN: I stand corrected. Thank you.

5 JUDGE CHACHKIN: All right. Objection sustained.

6 BY MR. SCHONMAN:

7 Q Had Translator TV, Inc., considered acquiring a  
8 full-power station before this time?

9 A No. I take that back. I had thought of it before,  
10 but there was nothing that, that was of interest to me to  
11 pursue it. There had been a station that was available, but I  
12 wasn't interested in pursuing it.

13 Q Where was that?

14 A Oh, I should -- it was a small market that I, I  
15 hadn't -- I didn't think it would be a viable thing for a  
16 full-power station. I can't remember where it was now.

17 Q Now, up to this time, Translator TV, Inc., had been  
18 in -- had been applying for low-power stations, correct?

19 A Yes.

20 Q In fact, that's what it was formed to do. Is --

21 A Yes.

22 Q -- that correct? Wasn't the planned acquisition of  
23 a full-power station inconsistent with Translator TV's goals?

24 A Well, we had a new opportunity and all the Directors  
25 were in agreement that this would be a very good way to go,

1 because it would give us an opportunity to get into a -- an  
2 area where we would serve a larger population. For obvious  
3 reasons, the low-power stations were limited as to their  
4 coverage. And we thought this would be a terrific  
5 opportunity. In fact, I was excited about it because here  
6 would be an opportunity for me to use my skills that I had  
7 learned with TBN and to, to really operate a station and to,  
8 to do some of the things that I had learned to do for TBN for  
9 National Minority.

10 Q Well, in point of fact this was the most exciting  
11 thing that had happened to Translator TV, Inc. --

12 A Yes.

13 Q -- since its inception?

14 A Yes, indeed.

15 Q Now, you testified that you spoke with Colby May --

16 A Yes.

17 Q -- about whether Translator TV, Inc., could, could  
18 acquire a full-power station. Do you have any knowledge as to  
19 whether Colby May was aware at that time that Translator TV,  
20 Inc., had been holding its annual meetings in a combined  
21 fashion with TBN?

22 A Yes, he did know that and he told us that we needed  
23 to make things as separate as we could because -- he -- and he  
24 recommended that we not have combined board meetings.

25 Q Do you have any knowledge as to whether Colby May

1 knew that Translator TV, Inc., was included in the Combined  
2 Financial Reports with TBN?

3 A I don't know if he was aware of that at that time.  
4 He did tell me to look into our accounts and to make sure that  
5 we were separate and we, we did at that time. It was shortly  
6 after that -- it was around that time, I think, that it was  
7 found -- it wasn't because I personally knew it, but somebody  
8 in the Accounting Department apparently focused on the fact  
9 that the errors had been made that were started by Mr. Phipps  
10 back in 1981 and it was corrected, because obviously nobody  
11 had focused on it. But somebody in the Accounting Department  
12 actually must have found that and made the correction. But I  
13 wasn't aware of it until during the time that we were prep--  
14 in preparation for -- during the discovery, I believe, when we  
15 were producing documents for discovery that we realized that  
16 there was that problem.

17 Q Now, as I understand it, it was Reverend Crouch who  
18 first informed you about the availability of the Odessa per-  
19 mit. Is that correct?

20 A Yes.

21 Q Did he tell you in person or by telephone?

22 A I think he called me on the phone.

23 Q Do you recall when that was?

24 A I can't remember the exact date, no.

25 Q Was he calling you from his, his office in TBN, your

1 office in TBN?

2 A Yes. We're in the same building.

3 Q What is it exactly that he told you, to the best of  
4 your recollection?

5 A He said Dave Roever has got a permit. Why don't you  
6 call and see what Colby says about it, you know, if this would  
7 be something that, that NMTV could do -- or TTV could do. And  
8 -- because, you know, we both knew that TBN had 12 stations  
9 and we were both aware of the rules change. So, that's why I  
10 called Mr. May.

11 Q Who made contact with Mr. Roever, who I take it was  
12 the owner of the CP, the --

13 A Yes.

14 Q -- the holder of the CP?

15 A Okay. I did.

16 Q You did? You did that by telephone?

17 A Yes.

18 Q And what is it you told him?

19 A I told him that we were interested in the permit. I  
20 think I talked to him first before I talked to Mr. May. I'm  
21 not absolutely sure which way it would be. I think I talked  
22 to him after I talked to Mr. May so I would have more  
23 information to give him.

24 And he told me that, you know, it was very simply,  
25 he says: my brother got this permit and he doesn't know what

1 to do with it and he's about to lose it. It's going to ex-  
2 pire. And if you can do something with it, we would rather  
3 see you folks get it than to, to let it go back.

4 So, I proceeded to find out how much he wanted for  
5 it and he said they had \$12,500 in expenses, and I said that's  
6 terrific and proceeded to -- you know, to, to go ahead with  
7 the transfer. We filled out the application and filed it with  
8 the FCC.

9 Q Who filled out the application?

10 A I think I did parts of it and then Colby May's  
11 office did the rest of it.

12 Q Now, you spoke with a man by the name of Dave  
13 Roever?

14 A Dave Roever was the brother. I talked to Al Roever,  
15 who was the actual owner.

16 Q Al Roever was the holder of the permit?

17 A Yes. Uh-huh.

18 Q Mrs. Duff, would you turn to Bureau Exhibit No. 120,  
19 please? Would you take a moment to review that?

20 JUDGE CHACHKIN: Are we ready to proceed?

21 MR. SCHONMAN: I don't know, Your Honor.

22 JUDGE CHACHKIN: Have you had an opportunity to read  
23 that material or -- Ms. Duff?

24 MRS. DUFF: Yes.

25 JUDGE CHACHKIN: Are you ready to proceed?



1 MRS. DUFF: The letter is kind of hard to read be-  
2 cause of the way its blocked, that some of it is blocked out.

3 JUDGE CHACHKIN: Now, you want to focus on specific  
4 language or just generally?

5 BY MR. SCHONMAN:

6 Q No. Actually, it's a general question. I notice  
7 that this is a letter to Dave Roever, that's R O E V E R,  
8 Reverend Roever in Odessa. And it's written on TBN sta-  
9 tionery, and you identify yourself as Assistant to the  
10 President, and that was the, the position you held at TBN?

11 A That's correct.

12 Q Why did you do that, Mrs. Duff? I thought it was  
13 Translator TV, Inc., that was contemplating purchasing this  
14 station?

15 A It was. I don't know why I used the stationery. It  
16 was an error.

17 Q Did you identify to Mr. Roever who was planning to  
18 purchase this construction permit?

19 A I did.

20 Q Who did you tell him was going to purchase it?

21 A National Minority. I, I made it clear to him,  
22 because I explained to him how we had to make sure that it was  
23 something that the FCC would allow us to do, and I, I ex-  
24 plained to, to him regarding it. But this was just an error  
25 on my part.

1 Q When did you explain that to him, that it was NMTV  
2 and not TBN?

3 A I'm sure I explained it to him in the beginning  
4 because that's the only way we could have acquired the station  
5 at that particular time.

6 MR. SCHONMAN: Your Honor, I'd like to show the  
7 witness a document. I'm not going to give copies to the  
8 reporter at this time. I don't think I'm going to -- I could  
9 offer it, offer it. Thank you.

10 BY MR. SCHONMAN:

11 Q This is a declaration from Al Roever dated November  
12 24, 1993. Mrs. Duff, have you had the opportunity to look at  
13 that?

14 A Yes.

15 Q Now, you'll notice Mr. Roever states here that it  
16 wasn't until he arrived in California to actually sign the  
17 documents that he learned that it was Translator TV, Inc., and  
18 not TBN. Does that help refresh your recollection as to  
19 whether you told him that TBN or Translator TV, Inc., was  
20 going to purchase this station early on?

21 A Okay. I'm sure I did discuss it with him, because I  
22 had to explain to him that we had to get information from our  
23 attorney to even find out if we could do this. So, if he has  
24 forgotten, I, I'm very sure that I did explain. He may not  
25 have understood it thoroughly, but I made -- at least made an

1 attempt to explain it to him at the time that I did talk to  
2 him, that it was not Trinity that was going to purchase the  
3 station.

4 Q And it's your testimony that this letter, which is  
5 Bureau Exhibit No. 120 on TBN stationery, that was a  
6 mistake --

7 A I, I --

8 Q -- if, if you used that stationery?

9 A Yes. That might have -- but this letter went to, to  
10 Dave Roever, so I don't --

11 Q Mrs. Duff, wasn't it Mr. Roever's concern that the  
12 station carry TBN programming --

13 A Yes.

14 Q -- and nothing else?

15 A He did -- well, I don't know if nothing else. He  
16 did -- he just wanted to make sure that Trinity programming  
17 was going to be on the station. I didn't really discuss with  
18 him any other programming that we had planned.

19 JUDGE CHACHKIN: Now, there is no mention in this  
20 letter about any conversations with you. All the letter  
21 mentions is a telephone conversation with Reverend Crouch. Is  
22 it still your testimony that you spoke on the phone --

23 MRS. DUFF: Oh, yes.

24 JUDGE CHACHKIN: -- to Mr. Roever?

25 MRS. DUFF: I talked to Dave and I also talked to

1 Al.

2 JUDGE CHACHKIN: Well, Al in his letter -- so,  
3 you're saying Al -- you're saying notwithstanding the fact  
4 that Al only recalls a conversation with Reverend Crouch -- I  
5 mean, that's the only one he mentions -- that it's your spe-  
6 cific relec-- recollection that you did in fact speak to  
7 Alfred Roever?

8 MRS. DUFF: Absolutely. Yes, sir, I did. I talked  
9 to Dave Roever and I talked to Al Roever.

10 BY MR. SCHONMAN:

11 Q Mrs. Duff, is it your testimony that you mailed  
12 documents to Mr. Roever and that he signed them and mailed  
13 them back?

14 A Yes.

15 Q It's your testimony that Mr. Roever did not travel  
16 to California and sign them at TBN's headquarters?

17 A Travelled -- boy, if he travelled to TBN, I don't  
18 remember it. I thought --

19 JUDGE CHACHKIN: It's paragraph eight.

20 MRS. DUFF: He travelled to TBN? Maybe I'm missing  
21 something. I didn't remember him coming to TBN. I know that  
22 I had signed -- I had sent him documents through the mail, but  
23 maybe he did -- I don't remember him coming to TBN, possibly  
24 he did, but I have sent documents to him through the mail.  
25 Perhaps it was the closing documents. But I didn't remember

1 him coming to TBN.

2 MR. SCHONMAN: Your Honor, I'd like to have marked  
3 as Bureau Exhibit No. 414 the Declaration that is being circu-  
4 lated, the Declaration of Al Roever dated November 24, 1993, a  
5 two-page document.

6 JUDGE CHACHKIN: The document described by the  
7 Bureau will be marked for identification as Bureau Exhibit  
8 214.

9 (Whereupon, the document referred to  
10 as Bureau Exhibit No. 414 was marked  
11 for identification.)

12 MR. SCHONMAN: I've handed the -- 414, sir.

13 JUDGE CHACHKIN: 414. I'm sorry. 414.

14 MR. SCHONMAN: I've handed the reporter an original  
15 and, and a copy of the Declaration.

16 JUDGE CHACHKIN: Okay.

17 MR. SCHONMAN: Mrs. Duff, let's move on to Bureau  
18 Exhibit No. 122.

19 JUDGE CHACHKIN: You're not offering it at this  
20 time, 414?

21 MR. SCHONMAN: No, sir. Not at this time.

22 JUDGE CHACHKIN: All right. What's the next exhibit  
23 you wanted to look at?

24 MR. SCHONMAN: 122. That was a Purchase Agreement  
25 for the Odessa station.

1 BY MR. SCHONMAN:

2 Q Mrs. Duff, who drafted this agreement?

3 A This is an agreement that I believe came from Colby  
4 May's office.

5 Q And the purchase price was \$12,500?

6 A Yes.

7 Q How was Translator TV, Inc., going to come up with  
8 the \$12,500 to purchase this permit?

9 A We had assurances that TBN would loan us the money.

10 Q Did in fact TBN loan Translator TV, Inc., money?

11 A Yes.

12 Q Was there a loan agreement?

13 A I don't believe at this particular time there was an  
14 actual loan agreement. I don't think it was reduced to  
15 writing.

16 Q What were the terms of the loan, if any?

17 A I don't think it was reduced to, to writing, so  
18 therefore the terms were that we would just repay it when we  
19 got the money.

20 Q Mrs. Duff, if we can turn to Bureau Exhibit No. 123,  
21 and that's an Invoice from the Law Offices of May and Dunne  
22 directed to Trinity Broadcasting Network. And you'll note  
23 that it says for services rendered through January 9, 1987.

24 A Um-hum.

25 Q Do you see that?

1 A Yes.

2 Q Now, had May and Dunne provided any services to  
3 Translator TV, Inc., between December 15, 1986, and January 9,  
4 1987?

5 A Oh, this was -- this bill was January 10th. The,  
6 the purchase was signed January 10th.

7 Q That's right.

8 A So -- and the bill was through January 9th.

9 Q Right. And I suppose that this agreement was  
10 prepared --

11 A Prior.

12 Q -- before the day it was signed?

13 A Yes.

14 Q Was it prepared --

15 A Well, it --

16 Q -- between December 15, 1986, and January 9, 1987?

17 A Well, I would think -- it possibly might have been  
18 on -- I don't know this, but -- I don't know whether the  
19 billing was up -- was -- you know, was accurate as far as the  
20 time that this agreement was done. I don't know if it got on  
21 that bill. I don't know whether they charged us or not.

22 Q But you would agree that the law firm of May and  
23 Dunne did provide --

24 A Yes.

25 Q -- services for Translator --

1 A They did.

2 Q -- TV, Inc., between December 15, 1986, and January  
3 9, 1987, correct?

4 A In the preparation, I would think so.

5 Q Correct?

6 A Yes.

7 Q Let's move on to Bureau Exhibit No. 124.

8 JUDGE CHACHKIN: If we're moving on to something  
9 new, let's -- is this a -- or I'd take a short -- or we'll  
10 take a 10-minute recess at this time.

11 (Whereupon, a short recess ensued.)

12 JUDGE CHACHKIN: Mr. Schonman?

13 MR. SCHONMAN: Mrs. Duff, can we turn to Bureau  
14 Exhibit No. 124?

15 JUDGE CHACHKIN: Oh, wait. Which one was that?

16 MR. SCHONMAN: 124.

17 JUDGE CHACHKIN: 124.

18 BY MR. SCHONMAN:

19 Q It's the 1987 Annual Meeting of Combined Boards of  
20 Directors. Do you have that before you?

21 A Yes.

22 Q Do you want to take a moment to look through that,  
23 familiarize yourself with it?

24 A This was the wrong --

25 JUDGE CHACHKIN: Do you want to read the entire



1 document or is there some parts you're interested in?

2 MR. SCHONMAN: Well, I'm only interested in having  
3 the witness be familiar with the document.

4 JUDGE CHACHKIN: Oh.

5 MR. SCHONMAN: Not necessarily to --

6 JUDGE CHACHKIN: It's unnecessary to read it in  
7 full.

8 MRS. DUFF: Oh, I'm sorry. I, I --

9 JUDGE CHACHKIN: There --

10 MRS. DUFF: -- thought you wanted me to read it.  
11 Okay.

12 MR. SCHONMAN: You're okay?

13 JUDGE CHACHKIN: If it's necessary for you to read a  
14 portion after he asks you the question, you can do so, but  
15 apparently it's not -- you to read all eight, nine pages. Go  
16 ahead --

17 MR. SCHONMAN: Now, Mrs. Duff --

18 JUDGE CHACHKIN: -- Mr. Schonman.

19 BY MR. SCHONMAN:

20 Q -- this was a combined Meeting of the Board of  
21 Directors held on January 19, 1987, correct?

22 A Yes.

23 Q And Translator TV, Inc., as in earlier years, was  
24 included in this combined meeting?

25 A Yes.

1 Q Why was that?

2 A I, I don't really know, but my same answer from  
3 before.

4 Q And what was that?

5 A My same answer from before. There was not, as I can  
6 remember, a consensus of the Board deciding to have the  
7 meeting with the other corporations. I, I don't really have  
8 an explanation. First --

9 Q Now -- I'm sorry. Go ahead.

10 A No. I was just going to say I believe this was the  
11 last combined meeting we had.

12 Q Now, just several days earlier, earlier than this  
13 meeting of January '87, Translator TV, Inc., had entered into  
14 a contract to acquire the Odessa station, correct?

15 A Yes.

16 Q And before Translator TV, Inc., entered into the  
17 Odessa station, you contacted Colby May, correct?

18 A Yes.

19 Q And you testified earlier that Colby May informed  
20 you that Translator TV, Inc., should be more separate from  
21 TBN, correct? Isn't that what he counselled you?

22 A Yes, but I didn't think of it in terms -- the, the  
23 plans -- obviously, when you put together a meeting like this,  
24 I think that probably the plans for it had already been made  
25 for the meeting. I, I don't -- I really don't have an expla-

1 nation for --

2 Q Well, in light of the counsel that Colby May gave  
3 you, or that you testified he gave you, why is it then that  
4 Translator TV, Inc., didn't hold its own meeting in January  
5 1987?

6 A I don't have an explanation for that. I don't  
7 really have that good a memory as to all of the things that  
8 occurred at that time.

9 JUDGE CHACHKIN: I also believe you testified that  
10 one of the reasons they didn't hold -- they held a joint  
11 meeting was because of the lack of activity of Translator TV.  
12 Now, isn't it a --

13 MRS. DUFF: Right.

14 JUDGE CHACHKIN: -- fact that as of this meeting  
15 there had been activity of Translator TV?

16 MRS. DUFF: There had been recent activity.

17 JUDGE CHACHKIN: So, the explanation that you gave  
18 that it was because of lack of activity is certainly not true  
19 in this instance, is it?

20 MRS. DUFF: In this instance it wasn't. So, I, I  
21 really don't -- I can't give an explanation as to what was  
22 happening right at this meeting, and I don't have an explana-  
23 tion for this specific meeting.

24 BY MR. SCHONMAN:

25 Q Now, Mrs. Duff, the planned activity that the Judge

1 is referring to was the proposed acquisition of the Odessa  
2 construction permit.

3 A Um-hum.

4 Q It was an action that you testified earlier was just  
5 about the biggest thing to happen to Translator TV, Inc., to  
6 date.

7 A Right.

8 Q I've read these Minutes from back to front and there  
9 is absolutely no reference in these Minutes to Translator TV,  
10 Inc.'s proposed acquisition of the Odessa permit. Now, I, I  
11 ask you why is that?

12 A The only thing I would be able to do is to try to  
13 reconstruct and have -- just conjecture, and I don't know if  
14 you want me to do that in this situation or, or --

15 Q I just want an --

16 A -- not.

17 Q -- explanation.

18 A I think probably the reason why there wasn't any-  
19 thing in here about Translator is for that very reason, that I  
20 had gotten that information from Colby and that's why any  
21 activity regarding Translator was not put into the Minutes,  
22 and that was the reason for it, because at that point we had  
23 realized that we needed to have a separate meeting.

24 Q I want to make sure I understand you. Translator  
25 TV, Inc., is having a combined meeting on January 1987 with

1 Trinity, but because of Mr. Colby May's advice that Translator  
2 TV, Inc., should separate itself from TBN there's no reference  
3 in the Minutes to any Translator TV, Inc., activities. Is  
4 that, is that what you're, you're telling me?

5 A That -- well, no. That Translator business was not  
6 taken care of during this meeting for that reason, and that's  
7 more than likely why there wasn't anything in the Minutes.

8 JUDGE CHACHKIN: Are you speculating about this  
9 or --

10 MRS. DUFF: That's why --

11 JUDGE CHACHKIN: -- stating this as a matter of  
12 knowledge?

13 MRS. DUFF: Okay. That's what I was explaining,  
14 that I didn't want to speculate. However, he's asking me for  
15 an explanation --

16 MR. SCHONMAN: If you know.

17 MRS. DUFF: -- and that's the only -- I don't have a  
18 exact memory of why, but that's the only thing I can say is  
19 that, that most likely is what happened, the reason why there  
20 wasn't -- I can't tell you because I cannot remember.

21 BY MR. SCHONMAN:

22 Q There was Translator TV business transacted at this  
23 meeting, wasn't there? And page 3 refers to that. It shows  
24 that Terrence Hicke was there as an Assistant Secretary of the  
25 corporation. So, Translator TV, Inc., did conduct business at

1 this Annual Meeting, didn't it?

2 A It looks like that -- I didn't see anything else  
3 other than -- in fact, I missed that. I didn't see that when  
4 I looked through it to begin with.

5 Q And, in fact, Colby May was at the meeting. He  
6 attended the meeting in 1987, didn't he?

7 A Yes, but I don't believe there was any other -- I  
8 didn't see any other business of Translator in here. So --

9 JUDGE CHACHKIN: And you have no explanation as to  
10 why the Odessa station was not discussed at this meeting?

11 MRS. DUFF: That was the only thing I could think  
12 of, and that was conjecture.

13 JUDGE CHACHKIN: Well, I don't want conjecture.

14 MRS. DUFF: Well --

15 JUDGE CHACHKIN: You have no explanation --

16 MRS. DUFF: I do not.

17 JUDGE CHACHKIN: -- as a Director --

18 MRS. DUFF: I'm sorry.

19 JUDGE CHACHKIN: -- of Translator TV at, at a  
20 meeting at which you attended -- you attended this meeting,  
21 did you not?

22 MRS. DUFF: Yes.

23 JUDGE CHACHKIN: -- as to why there was no discus-  
24 sion of Odessa, which you describe as the most significant  
25 development in Translator TV's history? You have no

1 explanation for that?

2 MRS. DUFF: No, I don't. As you --

3 JUDGE CHACHKIN: All right.

4 MRS. DUFF: -- can see, these Minutes are extremely  
5 extensive and there was an awful lot of activity that took  
6 place. And -- but I do not have a specific memory as to why  
7 there was nothing mentioned about Translator in this.

8 JUDGE CHACHKIN: All right. Go ahead, Mr. Schonman.

9 BY MR. SCHONMAN:

10 Q Mrs. Duff, let's turn to page 6 of this same exhib-  
11 it, and just about in the middle of the page is the paragraph  
12 which begins, "Jane Duff then briefly reported on procedures."

13 A Yes.

14 Q Why don't you take a moment to read through that.

15 A Yes.

16 Q The procedures that you recommended were procedures  
17 for all the companies in attendance at this meeting?

18 A That, that's right. As head of the Public Affairs  
19 Department, I over-- well, part of my responsibility was to  
20 oversee all of the Public Affairs Departments for all the  
21 stations of, of TBN, and this was an Annual Meeting. There-  
22 fore, all of the station managers were present, and that would  
23 be a presentation that I would make to the station managers.

24 Q But these were procedures that you recommended for  
25 all the companies in attendance at this combined meeting, is

1 that correct?

2 A That's correct.

3 Q Thank you.

4 A And that wouldn't have been for Translator because  
5 Translator didn't have any employees.

6 Q So, the procedures that you recommended were, were,  
7 were not for all the companies in attendance at this meeting?

8 A Not for Translator. My capacity here was for, for  
9 TBN, because I was attending as Assistant to the President.

10 Q Where does it say that there's a distinction here  
11 that, that one company is included but another is not in  
12 your --

13 A Well --

14 Q -- your recommended procedures?

15 A Well, the problem is, I'm trying to explain, is the  
16 fact that Translator didn't have any employees so it would not  
17 apply to them.

18 Q Did Community Educational Television, Inc., have  
19 employees?

20 A Yes.

21 Q So, it applied to CET?

22 A I don't believe the CET station managers were  
23 included. I would have to look and see.

24 Q Well, CET was included at this meeting.

25 A Well, what I meant is to see if CET employees were



1 included. Without looking at this again, I wouldn't be able  
2 to tell you.

3 JUDGE CHACHKIN: Well, did Translator TV carry out  
4 any ascertainment efforts?

5 MRS. DUFF: No, sir.

6 JUDGE CHACHKIN: Never ascertained -- it never  
7 interviewed any community leaders or did any of the things  
8 that are set forth in that paragraph?

9 MRS. DUFF: At this time, the station hadn't been  
10 built and it wasn't a requirement at this time to do the  
11 ascertainment prior to acquiring the station.

12 JUDGE CHACHKIN: Well, after you acquired the  
13 station, did it conduct any ascertainment efforts?

14 MRS. DUFF: Yes, sir, they did.

15 JUDGE CHACHKIN: And who conducted those efforts?

16 MRS. DUFF: The station's employees.

17 JUDGE CHACHKIN: Which station employees?

18 MRS. DUFF: The Odessa station employees.

19 JUDGE CHACHKIN: Were any of them employees of TBN?

20 MRS. DUFF: No, sir.

21 JUDGE CHACHKIN: Were the procedures listed here  
22 followed?

23 MRS. DUFF: Yes, sir.

24 JUDGE CHACHKIN: Go ahead, Mr. Schonman.

25 BY MR. SCHONMAN: